

IN THE UNITED STATES DISTRICT COURT OF THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

IN RE: DIGITEK PRODUCT LIABILITY  
LITIGATION

MDL NO. 1968

THIS DOCUMENT RELATES TO:

ALL ACTIONS

APPLICATION FOR COMMON  
BENEFIT FEES AND EXPENSES;  
DECLARATION OF SHAMUS B.  
MULDERIG IN SUPPORT  
THEREOF

Hissey Kientz, LLP hereby makes this initial application for award of common benefit fees and expenses for work done and expenses incurred for the common benefit of Digitek Claimants pursuant to this Court's Order. In support thereof, counsel Shamus B. Mulderig states:

1. I am the Managing Attorney of the Pharmaceutical Litigation Department of Hissey Kientz, LLP in Austin Texas. I am licensed to practice law in the states of New York, Texas, Pennsylvania and Arkansas, the United States District Court for the Western District of New York and the United States District Court for the Northern District of New York. I have also been admitted to practice *pro hac vice* in several state and federal actions.

2. My firm, Hissey Kientz, LLP, has been actively involved in numerous complex and multidistrict litigations throughout the United States, including *Hormone Replacement Therapy* (on Plaintiffs' Steering Committee), *Ortho-Evra* (on California Plaintiffs' Steering Committee), *AMO-Complete Moisture Plus* (on Plaintiffs' Steering

Committee), *ReNu with Moistureloc*, *Vioxx*, *Seroquel*, *Kugel Hernia Mesh*, *Zyprexa*, *Guidant*, *Fleet*, and *Celebrex/Bextra*.

3. I was appointed to the Plaintiffs' Steering Committee in this MDL by Order of this Court (PTO 23) dated May 29, 2009. Since that time, I and Hissey Kientz, LLP attorneys Kristin Giaquinta Schoen, Kathleen K. McGinn and David L. Friend have worked diligently to help secure a fair and just resolution of Digitek claims by, *inter alia*, performing the following tasks:

a.) Preparing Trial Group 1 action, *William Young, Jr. v. Actavis, et. al* for trial, including, amongst other things, propounding and responding to full written discovery, preparing and presenting Mr. and Mrs. (Cheryl) Young for deposition, conducting the depositions of Mr. Young's treating and prescribing physicians, and preparing an expert cardiologist witness for deposition;

b.) Conducting an in-depth analysis of documents in the Pennsylvania State Court action, *Tina Lopez v. Actavis et. al*, including review of expert reports, medical records, pleadings and deposition transcripts, in order to develop general liability theories and evidence in further preparation for the trial of MDL Trial Group 1 action, *William Young, Jr. v. Actavis, et. al*, and to facilitate cooperation, coordination and communication between Federal and State coordinated actions for the benefit of all MDL claimants;

c.) Preparing for and conducting the depositions of liability fact witnesses from Defendant Actavis, including Production Manager, Eric Cardona; Investigations Specialist, Michael Ponzo; and Director of Marketing, Brian Nizio;

d.) Devoting more than 100 hours to the review, analysis and coding of liability documents produced by defendants;

e.) Summarizing multiple liability witness deposition transcripts in order to assist and benefit all attorneys on the PSC with conducting further liability witness depositions;

f.) Participating in numerous Plaintiffs' Steering Committee strategy meetings.

4. The number of hours and the hourly rate for the work performed by Hissey Kientz, LLP for the common benefit of all Digitek MDL claimants and their attorneys is \$136,781.25, as follows:

Attorney	Hours	Rate	Lodestar
Shamus B. Mulderig	158.35	\$350.00	\$55,422.50
Kristin Giaquinta Schoen	185.25	\$275.00	\$50,943.75
Kathleen K. McGinn	60.90	\$350.00	\$21,315.00
David L. Friend	26.00	\$350.00	\$9,100.00
Total	430.50		\$136,781.25

Billing detail of time claimed is attached hereto as Exhibit A. All of the time claimed by Hissey Kientz, LLP timekeepers was for work performed for the common benefit of all Digitek MDL claimants and their attorneys. None of the time claimed by Hissey Kientz, LLP was related to the Digitek class action lawsuit.

5. The hourly rates shown above are the usual and customary rates charged for each individual in our pharmaceutical litigation practice. Timekeepers Shamus B. Mulderig, Kathleen K. McGinn and David L. Friend are associate attorneys at Hissey Kientz, LLP. Attorney Kristin Giaquinta Schoen is Of Counsel at Hissey Kientz, LLP and is also a Registered Nurse. The hours claimed herein are a very conservative total and do not include hours worked by former Hissey Kientz, LLP attorney G. Erick Rosemond who was a member of the Digitek Steering Committee from November 5, 2008 until February of 2009, at which time Mr. Rosemond left Hissey Kientz, LLP and joined another law firm.

6. Additionally, Hissey Kientz, LLP incurred a total of \$83,289.23 in expenses for the common benefit of all Digitek MDL claimants and their attorneys, for, *inter alia*, travel related to PSC duties, expert witness fees and costs and the PSC assessment. Of the expenses incurred, \$54,857.80 were "MDL Expenses" and \$28,431.43 were "Held Expenses." A detailed breakdown of expenses is attached hereto as Exhibit B. Hissey Kientz, LLP has retained documentation of all common benefit costs incurred. None of the expenses were incurred for the benefit of the Digitek class action lawsuit.

Therefore, I respectfully request this Court to approve this Application for Common Benefit Fees in the amount of \$136,781.25 and Common Benefit Expenses in the amount of \$83,289.23, for a total of \$220,070.48.

Dated: 2/11/11

Respectfully submitted,

By: 

Shamus B. Mulderig, Esq.

(TX. Bar No. 4009239)

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**DIGITEK**  
**Hissey Kientz, LLP - Common Benefit Time**

<b>Date</b>	<b>Attorney</b>	<b>Date/Task</b>	<b>Hours</b>
05/11/09	Friend, D.L.	Attend Plaintiff's Steering Committee teleconference regarding status and discovery, including preparation and follow-up	0.60
05/11/09	McGinn, K.	Attend Plaintiff's Steering Committee teleconference regarding status and discovery, including preparation and follow-up	0.60
05/11/09	Mulderig, S.B.	Prepare for and Participate in Plaintiff's Steering Committee teleconference regarding prosecution strategy and status of discovery and motion practice	0.70
06/08/09	Mulderig, S.B.	Receipt, review and analyze Plaintiffs' first set of Interrogatories directed to Defendants in order to determine additional what Interrogatories need to be propounded on Defendant.	0.90
06/08/09	Mulderig, S.B.	Receipt, review and analyze Plaintiffs' first Request for Production of Documents directed to Defendants in order to determine what additional Requests need to be propounded on Defendant	0.70
06/11/09	Mulderig, S.B.	Participation in Plaintiffs' Steering Committee's meeting at the Westin in Houston, TX.	6.00
06/17/09	Mulderig, S.B.	Participated in teleconference with PSC regarding Prosecution strategy and bellwether trial selections.	1.00
07/06/09	Schoen, K. G.	Medical research in further preparation for trial of Trial Group 1 case, William Young: cardiac syndromes	4.00
07/07/09	Schoen, K.G.	Medical research in further preparation for trial of Trial Group 1 case, William Young: cardiac arrhythmias	3.00
07/08/09	Friend, D.L.	Participated in electronic database training from Crivella West.	1.00
07/08/09	McGinn, K.	Participated in electronic database training from Crivella West.	1.00
07/08/09	Mulderig, S.B.	Participated in electronic database training from Crivella West.	1.00
07/08/09	Schoen, K.G.	Medical research in further preparation for trial of Trial Group 1 case, William Young: treatment of arrhythmias	5.00
07/08/09	Schoen, K.G.	Participated in electronic database training from Crivella West.	1.00
07/09/09	Schoen, K.G.	Medical research in further preparation for trial of Trial Group 1 case, William Young: electrolyte imbalances	4.00
07/10/09	Schoen, K.G.	Medical research in further preparation for trial of Trial Group 1 case, William Young: kidney dysfunction	4.00
07/13/09	Schoen, K.G.	Prepare and revise power point presentation for 7/15 meeting	6.00
07/14/09	Schoen, K.G.	Meeting with PSC over dinner to discuss trial selections	3.00
07/15/09	Schoen, K.G.	Meeting in Philadelphia regarding bellwether trial selections	6.00
07/20/09	Friend, D.L.	Participated in teleconference with PSC regarding defense bellwether trial selections.	1.00
07/20/09	McGinn, K.	Participated in teleconference with PSC regarding defense bellwether trial selections.	1.00

**DIGITEK**  
**Hissey Kientz, LLP - Common Benefit Time**

<b>Date</b>	<b>Attorney</b>	<b>Date/Task</b>	<b>Hours</b>
07/20/09	Mulderig, S.B.	Participated in teleconference with PSC regarding defense bellwether trial selections.	1.00
07/20/09	Schoen, K.G.	07/20/09: Participated in teleconference with PSC regarding defense bellwether trial selections	1.00
07/21/09	Friend, D.L.	Participated in teleconference with PSC regarding PSC bellwether trial selections.	1.00
07/21/09	McGinn, K.	Participated in teleconference with PSC regarding PSC bellwether trial selections.	1.00
07/21/09	Mulderig, S.B.	Participated in teleconference with PSC regarding PSC bellwether trial selections.	1.00
07/21/09	Schoen, K.G.	Participated in teleconference with PSC regarding PSC bellwether trial selections	1.00
08/03/09	Schoen, K. G.	Participated in teleconference with PSC	1.00
08/04/09	Schoen, K.G.	Telephone call with bellwether client, William Young, Jr., regarding status of litigation and upcoming timeline of events	0.50
08/07/09	Mulderig, S.B.	Conference Call with Plaintiff Steering Committee regarding upcoming status conference	0.75
08/07/09	Schoen, K. G.	Conference Call with Plaintiff Steering Committee regarding upcoming status conference	0.75
08/11/09	Mulderig, S.B.	Status Conference	1.00
08/11/09	Schoen, K.G.	Status Conference	1.00
08/12/09	Schoen, K.G.	Review of medical records for bellwether client, William Young, Jr.	0.50
08/25/09	Schoen, K. G.	08/25/09 - 08/31/09: Coordination with Dr. Douglas Boyette and defense counsel regarding available deposition dates, scheduling of deposition	1.00
08/25/09	Schoen, K. G.	Coordination with William Young, Jr. and wife regarding available deposition dates; scheduling of deposition	1.00
09/03/09	Friend, D. L.	Participated in teleconference with PSC	1.00
09/03/09	McGinn, K.	Begin drafting case-specific discovery for William Young case.	0.40
09/09/09	Mulderig, S.B.	Participated in teleconference with PSC	1.00
09/14/09	Schoen, K. G.	Review of medical chronology for William Young, Jr. in preparation for upcoming deposition	1.00
09/16/09	McGinn, K.	Travel to Atlanta for Digitek Document Review training.	7.00
09/17/09	McGinn, K.	Attend Digitek Document Review Training.	3.50
09/17/09	McGinn, K.	Return travel to Austin after Digitek Document Review Training.	6.50
09/20/09	Mulderig, S.B.	Review and analyze trial group 1 plaintiff, William Young's medical records in preparation for presenting Mr. Young for deposition.	4.7
09/20/09	Schoen, K. G.	09/20/09-09/21/09: Prepare for and conduct Deposition of Dr. Boyette, William Young's treating cardiologist	20.00

**DIGITEK**  
**Hissey Kientz, LLP - Common Benefit Time**

<b>Date</b>	<b>Attorney</b>	<b>Date/Task</b>	<b>Hours</b>
09/21/09	Mulderig, S.B.	Meet with and prepare trial group 1 plaintiff, William Young for his deposition.	4.1
09/21/09	Mulderig, S.B.	Meet with and prepare trial group 1 plaintiff, William Young's wife, Cheryl Young for her deposition.	1.1
09/22/09	Mulderig, S.B.	Present trial group 1 plaintiff, William Young for his deposition.	4.7
09/22/09	Mulderig, S.B.	Present trial group 1 plaintiff, William Young's wife, Cheryl Young for her deposition.	1.5
10/19/09	Friend, D. L.	Attend Digitek PSC meeting in NY	2.60
10/20/09	Mulderig, S.B.	Conduct deposition of cardiologist, Douglas Boyette, M.D.	4.3
10/20/09	Mulderig, S.B.	Review and analyze trial group 1 plaintiff, William Young's medical records in preparation for conducting the deposition of cardiologist, Douglas Boyette, M.D.	3.7
11/09/09	McGinn, K.	Begin drafting interrogatories, requests for admissions and requests for production of documents to defendant Actavis in William Young (Bellwether) action.	3.20
11/09/09	Schoen, K. G.	Discussion with Medical consultant, Dr. Mark Lambert, re: Digitek injuries, review W. Young file	2.00
11/11/09	McGinn, K.	Continue drafting interrogatories, requests for admissions and requests for production of documents to defendant Actavis in William Young (Bellwether) action, including conference with S. Mulderig regarding same and strategy.	1.90
11/12/09	McGinn, K.	Continue drafting and editing interrogatories, requests for admissions and requests for production of documents to defendant Actavis in William Young (Bellwether) action	5.10
11/13/09	McGinn, K.	Begin drafting interrogatories, requests for admissions and requests for production of documents to defendants Mylan and UDL in William Young (Bellwether) action.	4.20
11/17/09	McGinn, K.	Continue drafting and editing interrogatories, requests for admissions and requests for production of documents to defendants Mylan and UDL in William Young (Bellwether) action.	2.90
11/18/09	McGinn, K.	Continue editing interrogatories, requests for admissions and requests for production of documents to defendants Actavis, Mylan and UDL in William Young (Bellwether) action.	3.00
12/01/09	Schoen, K. G.	Document Review	4.00
12/02/09	Schoen, K. G.	Digitek teleconference with PSC	0.45
12/03/09	Schoen, K. G.	Document Review	4.00
12/07/09	Schoen, K. G.	Digitek teleconference with PSC	0.45
12/16/09	Schoen, K. G.	Document Review	2.00

**DIGITEK**  
**Hissey Kientz, LLP - Common Benefit Time**

<b>Date</b>	<b>Attorney</b>	<b>Date/Task</b>	<b>Hours</b>
12/21/09	Schoen, K. G.	Drafted and issued subpoenas for William Young's treating MD's, Dr. Harmohan Singh and Dr. Bremhi Seth	0.50
01/05/10	Schoen, K. G.	Telephone call with bellwether trial selection (William Young) re: gathering additional information on treating physicians	1.10
01/07/10	Friend, D. L.	Participated in teleconference with PSC regarding prosecution strategy of trial group cases.	1.10
01/07/10	McGinn, K.	Attended PSC teleconference regarding bellwether litigation strategy	1.10
01/07/10	McGinn, K.	Review and analysis of Activas responses to bellwether William Young's written discovery.	0.30
01/07/10	Mulderig, S.B.	Participated in teleconference with PSC regarding prosecution strategy of trial group cases.	1.10
01/11/10	Schoen, K. G.	Meeting and review of attorney notes from January 7th PSC meeting	1.10
01/27/10	Mulderig, S.B.	Review and analyze trial group 1 plaintiff, William Young's medical records and deposition transcript in preparation for conducting the deposition of hospitalist, Brahmi Seth, M.D.	3.50
01/27/10	Mulderig, S.B.	Review and analyze trial group 1 plaintiff, William Young's medical records and deposition transcript in preparation for conducting the deposition of hospitalist, Harmohan Singh, M.D.	4.50
01/28/10	Mulderig, S.B.	Conduct deposition of hospitalist, Brahmi Seth, M.D.	2.10
01/28/10	Mulderig, S.B.	Conduct deposition of hospitalist, Harmohan Singh, M.D.	3.10
02/27/10	Schoen, K. G.	William Young, Jr. 008-32-7477 Digitek PSC: Deposition preparation: Dr. Smith and Dr. Jones – originally scheduled for March 2, to be rescheduled.	6.00
02/28/10	Schoen, K. G.	William Young, Jr. 008-32-7477 Digitek PSC: Deposition preparation: Dr. Smith and Dr. Jones – originally scheduled for March 2, to be rescheduled.	6.00
03/01/10	Schoen, K. G.	William Young, Jr. 008-32-7477 Digitek PSC: Deposition preparation: Dr. Smith and Dr. Jones – originally scheduled for March 2, to be rescheduled.	2.00
03/03/10	Schoen, K. G.	William Young, Jr. 008-32-7477 Digitek PSC: Review of deposition transcripts, preparation of summaries: Dr. Singh, Dr. Seth, Dr. Boyette; Review of case status with attorney; all in preparation for PSC meeting on 3/10/10	4.00
03/04/10	Schoen, K. G.	William Young, Jr. 008-32-7477 Digitek PSC: Review of deposition transcripts, preparation of summaries: Dr. Singh, Dr. Seth, Dr. Boyette; Review of case status with attorney; all in preparation for PSC meeting on 3/10/10	3.00
03/05/10	Schoen, K. G.	William Young, Jr. 008-32-7477 Digitek PSC: Review of deposition transcripts, preparation of summaries: Dr. Singh, Dr. Seth, Dr. Boyette; Review of case status with attorney; all in preparation for PSC meeting on 3/10/10	3.00
03/08/10	Friend, D. L.	Review physician depositions from William Young trial case and preparation for PSC meeting in South Carolina.	1.50
03/08/10	Schoen, K. G.	William Young, Jr. 008-32-7477 Digitek PSC: Review of deposition transcripts, preparation of summaries: Dr. Singh, Dr. Seth, Dr. Boyette; Review of case status with attorney; all in preparation for PSC meeting on 3/10/10	2.00

**DIGITEK**  
**Hissey Kientz, LLP - Common Benefit Time**

<b>Date</b>	<b>Attorney</b>	<b>Date/Task</b>	<b>Hours</b>
03/10/10	Friend, D. L.	Attend Digitek PSC meeting at offices of Motley Rice; discussion of matters related to trial cases and generic and specific causation and liability experts.	4.00
04/16/10	Mulderig, S.B.	Review Trial Group 1 plaintiff, William Young's medical records and deposition transcript in preparation for conducting deposition of his primary care physician, Dr. Bobby Jones.	1.70
05/03/10	Mulderig, S.B.	Participated in teleconference with Expert Consultant Cardiologist, Dr. Mark Lambert concerning Trial Group 1 plaintiff, William Young's use of defective Digitek and resulting injuries.	1.10
05/03/10	Mulderig, S.B.	Follow up notes and analysis from teleconference with Expert consultant Cardiologist, Dr. Mark Lambert concerning Trial Group 1 plaintiff William Young's use of defective Digitek and resulting injuries.	1.50
05/03/10	Schoen, K. G.	Telephone meeting with consulting expert, Dr. Mark Lambert.	1.50
05/07/10	McGinn, K.	Begin drafting page/line Summary of Scott Talbot Deposition.	4.30
05/07/10	Mulderig, S.B.	Preparation of page/line deposition summary of Richard Dowling's deposition testimony.	3.10
05/08/10	Mulderig, S.B.	Review and analyze Actavis produced documents in preparation for conducting the deposition of Eric Cardona.	3.70
05/08/10	Mulderig, S.B.	Review and analyze deposition transcript of Actavis' Director of Quality Assurance (Little Falls, NJ plant), Anthony Delicato in preparation for conducting further depositions of Actavis employees/witnesses.	1.30
05/08/10	Schoen, K. G.	Review and summary of Phyllis Lambridis deposition	4.00
05/09/10	Mulderig, S.B.	Review and analyze Actavis produced documents in preparation for conducting the deposition of Michael Ponzo. 3.3	3.30
05/10/10	McGinn, K.	Continue drafting page/line Summary of Scott Talbot Deposition.	1.10
05/10/10	Mulderig, S.B.	Review and analyze Actavis produced documents in preparation for conducting the deposition of Brian Nizio.	5.70
05/11/10	Mulderig, S.B.	Conducted the deposition of Actavis Production Manager, Eric Cardona.	6.90
05/12/10	McGinn, K.	Continue drafting page/line Summary of Scott Talbot Deposition.	0.70
05/12/10	Mulderig, S.B.	Conducted the deposition of Actavis Investigations Specialist, Michael Ponzo.	7.10
05/13/10	McGinn, K.	Continue drafting page/line Summary of Scott Talbot Deposition.	1.10
05/13/10	McGinn, K.	Continue drafting page/line Summary of Scott Talbot Deposition.	3.50
05/13/10	Mulderig, S.B.	Conducted the deposition of Actavis Director of Manufacturing, Brian Nizio.	7.30
05/17/10	Schoen, K. G.	Telephone meeting with testifying expert Dr. George Miller	2.00
05/20/10	Schoen, K. G.	Meeting with testifying expert, Dr. George Miller.	4.00
05/26/10	Mulderig, S.B.	Review Trial Group 1 plaintiff, William Young's medical records and deposition transcript in preparation for conducting deposition of his gastroenterologist, Dr. Brian Smith.	2.10

**DIGITEK**  
**Hissey Kientz, LLP - Common Benefit Time**

<b>Date</b>	<b>Attorney</b>	<b>Date/Task</b>	<b>Hours</b>
05/30/10	Friend, D. L.	Participated in teleconference with Expert Cardiologist, Dr. Mark Lambert concerning Trial Group 1 plaintiff, William Young's use of defective Digitek and resulting injuries.	1.10
06/04/10	Schoen, K. G.	Telephone meeting with testifying expert, Dr. George Miller	1.50
06/05/10	Schoen, K. G.	Telephone meeting with testifying expert, Dr. George Miller, explanation of expert report federal requirements.	3.50
07/14/10	Friend, D. L.	Prepare testifying expert, Dr. George Miller for Deposition in further preparation for trial of Trial Group 1 case, William Young	3.50
07/14/10	Mulderig, S.B.	Prepare testifying expert, Dr. George Miller for Deposition in further preparation for trial of Trial Group 1 case, William Young	3.50
07/15/10	Friend, D. L.	Prepare testifying expert, Dr. George Miller for Deposition in further preparation for trial of Trial Group 1 case, William Young	4.10
07/15/10	Mulderig, S.B.	Prepare testifying expert, Dr. George Miller for Deposition in further preparation for trial of Trial Group 1 case, William Young	4.10
07/16/10	Schoen, K. G.	Reviewed medical records from Visiting Nurses Association of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10
07/16/10	Schoen, K. G.	Reviewed medical records from Dr. Edward Abdullah of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10
07/16/10	Schoen, K. G.	Reviewed medical records from Mountains Community Hospital of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10
07/16/10	Schoen, K. G.	Reviewed medical chronology of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10
07/16/10	Schoen, K. G.	Reviewed medical records from Dr. Sami Nazzal of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10
07/16/10	Schoen, K. G.	Reviewed medical records from Preferred Surgeons of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10
07/16/10	Schoen, K. G.	July 16, 2010-July 17, 2010: Reviewed medical records from St. Bernadine Medical Center of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10
07/16/10	Schoen, K. G.	July 16, 2010-July 17, 2010: Reviewed medical records from Walgreens of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10
07/17/10	Schoen, K. G.	Reviewed medical records from Dr. Herrick of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10
07/17/10	Schoen, K. G.	Reviewed medical records from Rite Aid of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.10

**DIGITEK**  
**Hissey Kientz, LLP - Common Benefit Time**

<b>Date</b>	<b>Attorney</b>	<b>Date/Task</b>	<b>Hours</b>
07/17/10	Schoen, K. G.	Reviewed expert report of Gerald DeVaughn of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	2.10
07/18/10	Schoen, K. G.	Reived expert report of Walter Kernan, outlined issues for upcoming deposition of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	2.00
08/01/10	Schoen, K. G.	Reviewed expert report of Ronald Tallarida, outlined issues for upcoming deposition of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.00
08/02/10	Schoen, K. G.	Reviewed expert report of Keith Klein, outlined issues for upcoming deposition of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.50
08/08/10	Schoen, K. G.	Reviewed expert report of Robert Norris, outlined issues for upcoming deposition of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.00
08/10/10	Schoen, K. G.	Reviewed expert report of Joseph Parillo, outlined issues for upcoming deposition of first Pennsylvania state court trial case, Tina Lopez in further preparation for the trial of the MDL trial group case, William Young.	1.00
08/19/10	Mulderig, S.B.	Participate in PSC Meeting regarding the Proposed Master Settlement Agreement in Philadelphia, PA	1.50
08/27/10	Friend, D. L.	Digitek Call re: proposed settlement	0.50
08/27/10	Schoen, K. G.	igitek Call re: proposed settlement	0.50
*	Friend, D.L.	Digitek Database Document Review (total)	3.00
*	McGinn, K.	Digitek Database Doc Review (total )	7.50
*	Mulderig, S.B.	Digitek Database Document Review (total)	51.00
*	Schoen, K.G.	Digitek Database Document Review (total)	42.30
<b>TOTAL</b>			<b>430.50</b>